

**IN THE CIRCUIT COURT OF WASHINGTON COUNTY, MISSISSIPPI**

**SHATEL HARTLEY**

**PLAINTIFF**

**VS.**

**CAUSE NO.:** 2015-0015CI

**DOLLAR GENERAL CORPORATION**

**DEFENDANT**

**COMPLAINT**

Shatel Hartley (Hartley), through counsel, files this Complaint against Dollar General Corporation (Dollar General), and as cause states:

1.

Shatel Hartley is an adult resident citizen of Washington County, Mississippi.

2.

Dollar General Corporation is a Tennessee Corporation registered to do business in Mississippi. It may be served with process on its registered agent, Corporation Service Company, 506 South President Street, Jackson, Mississippi 39201.

3.

On or about February 11, 2014, Ms. Hartley entered the Dollar General Store in Greenville, Mississippi located at 1799 Highway 1, North to buy products. While attempting to enter the store, Ms. Hartley slipped and fell on ice by the entrance to the store. Ms. Hartley suffered a broken ankle and other injuries.

**VENUE**

4.

Venue is proper in this Court, as the actions and/or inactions which led to this claim occurred in Washington County, Mississippi.

**Received & Filed**

**FEB 13 2015**

Barbara Esters-Parker  
By: [Signature] D.C.

**LIABILITY**

5.

Under Mississippi law, Ms. Hartley was an invitee of Dollar General, as she entered Dollar General for the mutual benefit of herself and Dollar General in order to buy merchandise.

6.

Dollar General owed Ms. Hartley, an invitee, the non-delegable duty to provide her a reasonably safe premises, and in the event that there was an unsafe condition, it owed her the duty to warn her of that condition.

7.

Dollar General breached its duty to Ms. Hartley by allowing ice to be present in a highly trafficked area by the entrance to the store.

8.

Further, Dollar General breached its duty by not having any warnings as to the ice in the highly trafficked area by the entrance of the store. Not until after Ms. Hartley fell was a warning sign placed on the sidewalk by Dollar General.

**DAMAGES**

9.

As a result of Dollar General's unsafe premises, Ms. Hartley suffered, and continues to suffer significant injuries. The injuries include but are not necessarily limited to:

- a. A broken ankle, which required two (2) surgeries and bruising to her lower extremities;
- b. Past medical bills in the amount of approximately \$40,000.00; and

c. Past and future pain and suffering.

10.

Mr. Hartley demands a trial by a jury of her peers in the Circuit Court of Washington County, Mississippi, and prays that said jury award her an amount commensurate with the damages she has sustained, as well as any other relief the jury and/or this Court deems as proper.

**RESPECTFULLY SUBMITTED, THIS, THE 12<sup>TH</sup> DAY OF FEBRUARY,  
2015.**

**SHATEL HARTLEY, *Plaintiff***

**BY:**

  
**HEATH S. DOUGLAS, MSB NO. 102313**

**OF COUNSEL:**

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